

MARK E. FELGER (MF9985)
JERROLD N. POSLUSNY, JR. (JP7140)
COZEN O'CONNOR
LibertyView, Suite 300
457 Haddonfield Road
Cherry Hill, NJ 08002
(856) 910-5000
(856) 910-5075 (fax)

Attorneys for the Debtors

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| In re: | : | UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY |
| SHAPES/ARCH HOLDINGS L.L.C., <u>et</u> <u>al.</u> , | : | CHAPTER 11 |
| Debtors. | : | CASE NO. 08-14631 (GMB) (Jointly Administered) |
| | : | |

**APPLICATION FOR ORDER SHORTENING TIME PERIOD FOR NOTICE
OF DEBTORS' MOTION TO DETERMINE ALLOWED CLAIMS OF CLASS
CLAIMANTS UNDER SECTION 502(C) OF THE BANKRUPTCY CODE AND
RELATED RELIEF**

TO: THE HONORABLE GLORIA M. BURNS

Your applicant, Jerrold N. Poslusny, Jr., respectfully represents:

1. Your applicant is a member with the firm of Cozen O'Connor, attorneys for the above captioned debtors and debtors-in-possession (the "Debtors").¹ I am familiar with the facts of this case.

2. The Debtors have filed a motion to determine allowed claims of claimants under section 502(c) of the Bankruptcy Code and for related relief (the "Motion").

¹ Unless otherwise defined herein, all capitalized terms shall have the meanings ascribed to them in the Application.

3. A shortened hearing date is requested because it would be more efficient for the administration of these cases for the Motion to be heard on the same date as the confirmation hearing, which is scheduled for July 8, 2008 at 10:00 a.m.

4. Moreover, in the order approving the Debtors' disclosure statement in support of the Third Amended Plan, the Court allowed the Debtors until June 20, 2008 to file objections to claims and requests for the Court to estimate claims, established July 1, 2008 as the deadlines for responses, and ordered that any such motions would be considered at the confirmation hearing.

5. Finally, the Debtors note that the requested relief would provide parties with 18 days to respond to the Motion instead of 20 days required by the Local Rules.

6. Therefore, the Debtors submit that parties in interest will not be prejudiced by a shortened notice period.

7. Reduction of the time period in question is not prohibited under Fed. R. Bankr. P. 9006(c)(1) and the Rules listed therein.

WHEREFORE, your applicant requests entry of the Order submitted herewith.

Dated: June 20, 2008

COZEN O'CONNOR

By: /s/ Jerrold N. Poslusny, Jr.

Mark E. Felger

Jerrold N. Poslusny, Jr.

Attorneys for the Debtors